

JUL 09 '98 03:47PM NORTHDIV ENVIRONMENT

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File: 7574-3.1

c: Bullard  
Parker

DEPARTMENT OF THE NAVY

NORTHERN DIVISION

NAVAL FACILITIES ENGINEERING COMMAND

10 INDUSTRIAL HIGHWAY

MAIL STOP, #82

LESTER, PA 19113-2090

IN REPLY REFER TO

5090

Code 1823/JS

41393 09 JUL 1998

Ms. Kymberlee Keckler  
U.S. EPA Region I  
Federal Facilities Superfund Section  
John F. Kennedy Federal Building  
Boston, MA 02203-0001

Dear Ms. Keckler:

SUBJECT: REGULATORY COMMENTS ON THE DRAFT FINAL WORK PLAN FOR BUILDING 32  
GOULD ISLAND

This office has received a faxed copy of your letter dated July 7, 1998 regarding the Navy's response dated July 2, 1998 to comments received on the Draft Final Site Inspection Work Plan for Gould Island.

The Navy has clearly stated its position for conducting a Site Inspection at Gould Island in our letter of February 5, 1998 and repeatedly during Remedial Project Manager Meetings and Restoration Advisory Board Meetings. As mentioned in our July 2, 1998 letter the issue of conducting a Site Inspection (SI) versus a Remedial Investigation (RI) requires resolution, as there are funding and schedule impacts on other NETC IR sites that need to be considered, before any further efforts are made on the technical revisions to the work plan. Your letter suggests that the Navy is shifting funding priorities and avoiding remedy discussions. Please be reminded that the Navy submitted its funding plan for NETC Newport to USEPA and RIDEM for review and concurrence. The site cleanup strategies were based on the available funds for FY 98, and on priorities identified by the USEPA and RIDEM. We would like to schedule a conference call at your earliest convenience to resolve this matter. The Navy is extending the response to comments received by the USEPA and RIDEM to July 24, 1998 in accordance with Section 7 of the Federal Facilities Agreement.

This office is surprised and disappointed with the tone and implications suggested in your letter. The Navy as always will continue to share all information dealing with NETC's environmental IR site clean-up program, prioritization, funding and remedy selection process with the USEPA, RIDEM and the citizens of the Restoration Advisory Board. The Navy continues to strive for faster, quicker and more efficient environmental clean-up progress at NETC, however ultimate success can only be achieved when there exist a cooperative spirit among all parties.

In summary we expect the USEPA and RIDEM will continue to work with the Navy and the citizens of the Restoration Advisory Board in cleaning up the worst sites first at the NETC Newport. We look forward to our conference call to discuss outstanding issues at Gould Island.

Sincerely,

*James Shafer*

JAMES SHAFER  
Remedial Project Manager  
By direction of the  
Commanding Officer

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